

RECEIVED
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

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TONY and DOROTHY TURNER,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP, INC.;
AMERICAN GENERAL CORPORATION;
AMERICAN GENERAL FINANCE, INC.;
CREDIT CENTERS, INC., d/b/a AMERICAN
GENERAL FINANCE, INC.; MERIT LIFE
INSURANCE COMPANY; YOSEMITE
INSURANCE COMPANY; KATHIE ROWELL;
CONNIE FARMER; and Fictitious Defendants
"A", "B", and "C", whether singular or plural,
those other persons, corporations, firms, or other
entities whose wrongful conduct caused the
injuries and damages to the Plaintiff, all of whose
true and correct names are unknown to Plaintiffs
at this time, but will be substituted by
amendment when ascertained,

Defendants.

CIVIL ACTION NO. 3:05cv753-M

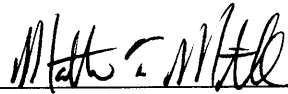
STATEMENT IN COMPLIANCE WITH FRCP 7.1

COME NOW defendants American General Financial Services of Alabama, Inc. ("AGFSI") (improperly designated as American General Finance Inc. in the complaint), as successor to American General Finance, Inc., Merit Life Insurance Company ("Merit"), and Yosemite Insurance Company ("Yosemite") (collectively referred to as "Defendants"), and

hereby submit this statement in compliance with Federal Rules of Civil Procedure Rule 7.1.¹ In support thereof, Defendants state as follows:

Defendants American General Financial Services, Inc., a Delaware corporation, Merit Life Insurance Co., an Indiana corporation, and Yosemite Insurance Company, an Indiana corporation, are not publicly traded, and each is wholly-owned by American General Finance Corporation, an Indiana corporation. American General Finance Corporation is not publicly traded and is wholly-owned by American General Finance, Inc., an Indiana corporation. American General Finance, Inc. is also not publicly traded, and is a wholly-owned subsidiary of American General Corporation, a Texas corporation. American General Corporation is not publicly traded, and is a wholly-owned subsidiary of American International Group, Inc., a Delaware corporation. American International Group, Inc. is a publicly traded corporation.

Respectfully submitted,



Robert H. Rutherford (RUT002)
David A. Elliott (ELL027)
Matthew T. Mitchell (MIT050)

Attorneys for Defendants

¹ The corporate entity known as Credit Centers, Inc. ("Credit Centers") previously operated in Mississippi and Louisiana, but upon information and belief, never did business in Alabama. In 1992, before any loans at issue in the Complaint, American General Finance, Inc., a Mississippi corporation, and American General Finance, Inc., a Louisiana corporation, purchased the assets of Credit Centers in Mississippi and Louisiana. Accordingly, Credit Centers has no relationship with any Defendant to this action, and upon information and belief, never did business with the plaintiff. Therefore, Credit Centers is fraudulently joined as a Defendant. In addition, Credit Centers has no agent for service of process in Alabama and it has not and cannot be served with the Summons and Complaint. As a result, no response to the Complaint is required from Credit Centers.

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Statement in Compliance with FRCP 7.1 was served on the following by directing same to their office addresses through first-class, United States mail, postage prepaid, on this the 8th day of August, 2005.

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